

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

RAY REYNOLDS,

Plaintiff,

v.

HEARST COMMUNICATIONS, INC.,

Defendant.

C.A. No. 1:17-cv-06720 (DLC)

**REPLY DECLARATION OF JENNIFER D. BISHOP
IN FURTHER SUPPORT OF DEFENDANT'S MOTION FOR A BOND
AS SECURITY FOR COSTS AND FEES UNDER LOCAL CIVIL RULE 54.2**

I, JENNIFER D. BISHOP, declare, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. My name is Jennifer D. Bishop, and I am over the age of 18 and fully competent to make this Declaration. I am an attorney admitted to practice before this Court. I am employed as Counsel to the Hearst Corporation, in the Office of the General Counsel, and an attorney for Defendant Hearst Communications, Inc. ("Hearst"). I make this Reply Declaration in further support of Hearst's Motion for a Bond as Security for Costs and Fees Under Local Civil Rule 54.2 (the "Motion"). I have personal knowledge of the matters stated in this Declaration, and each statement is true and correct.

2. Attached hereto as Exhibit 1 is a true and correct copy of the Memorandum Decision & Order issued by U.S. District Judge Katherine B. Forrest on May 19, 2016, in the matter of *Baiul v. NBC Sports*, No. 1:15-cv-09920 (KBF) (S.D.N.Y.).

3. Attached hereto as Exhibit 2 is a true and correct copy of the Memorandum Decision & Order issued by U.S. District Judge Katherine B. Forrest on August 22, 2014, in the

matter of *Baiul v. NBCUniversal Media LLC*, No. 1:13-cv-02205 (KBF) (S.D.N.Y.).

Executed this 26th day of January, 2018, in New York, New York.

/s/ Jennifer D. Bishop
JENNIFER D. BISHOP

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing on January 26, 2018.

/s/ Jennifer D. Bishop
Jennifer D. Bishop